

**James J. Sullivan, Jr.**  
215 665 5341  
james.sullivan@bipc.com

Two Liberty Place  
50 South 16th Street, Suite 3200  
Philadelphia, PA 19102-2555  
T 215 665 8700  
F 215 665 8760  
www.buchananingersoll.com

November 7, 2014

Gary Shinnars  
Executive Secretary  
National Labor Relations Board  
1099 14<sup>th</sup> Street, N.W.  
Washington, D.C. 20570-0001

**Re: Beacon Sales Acquisition, Inc. d/b/a Quality Roofing Supply Company  
Case 04-RD-136516**

Dear Mr. Shinnars:

Beacon Sales Acquisition, Inc. d/b/a Quality Roofing Supply Company ("Company") opposes the International Union of Operating Engineers, Local 542's ("Union") request for an extension of time to file exceptions to the Regional Directors' Report on Challenged Ballots in the above referenced matter because the Union has not demonstrated the required good cause.

First, the issue in dispute is very simple – whether a manager's inadvertently erroneous instruction to all three eligible voters to wait in a separate room until they were called to vote constitutes extraordinary circumstances that warrants opening their late ballots. The Union should have already addressed this issue in its submission to the Regional Director and should not need much time to prepare its exceptions.

Second, collective bargaining by its nature involves numerous free periods and the Union's counsel has not identified when he will be on vacation over the next week.

Third, granting the request will prejudice the employees who deserve to have their votes counted and the election resolved as soon as possible.

Accordingly, the Company submits that the Board should deny the Union's request to extend the deadline for filing exceptions.

Gary Shinnery  
November 7, 2014  
Page 2

If you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, reading "J. J. Sullivan, Jr." with a stylized, cursive script.

James J. Sullivan, Jr.

JJS:ph

cc: Dennis P. Walsh, Regional Director  
Louis Agre, Esquire (via: email)